

U.S. DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

B & W LOUDSPEAKERS LIMITED and
EQUITY INTERNATIONAL, INC.

Plaintiffs,

v.

KEF AUDIO (UK) LTD. and
ADCOM

Defendants.

DOCKETED

NOV - 7 2001

01C 8541
Civil Action No.

JURY DEMANDED JUDGE GETTLEMAN

MAGISTRATE JUDGE KEYS

COMPLAINT

NATURE AND STATUTORY BASIS OF ACTION

1. This is an action for (I) trade dress infringement under the laws of the United States, as provided for by Title 15 United States Code §1125(a); (II) trade dress dilution under the Federal Anti-Dilution Act, as provided for under Title 15 United States Code § 1125(c); (III) deceptive trade practices under the laws of the state of Illinois, as provided by 815 ILCS 510/1 - 510/7; and (IV) consumer fraud under the laws of the state of Illinois, as provided by 815 ILCS 505/1-505/12.

THE PARTIES

2. Plaintiff, B & W LOUDSPEAKERS LIMITED, is a corporation organized under the laws of the United Kingdom, having its principal place of business at Meadow Road, Worthing, West Sussex, England BN11 2RX.

1-1

3. Plaintiff, EQUITY INTERNATIONAL, INC., is a Massachusetts corporation, having its principal place of business at 54 Concord Street, North Reading, Massachusetts 01864.

4. On information and belief, Defendant, KEF AUDIO (UK) LTD., is a corporation organized under the laws of the United Kingdom, having its principal place of business at Eccleston Road, Tovil, Maidstone, Kent ME15 6QP, United Kingdom.

5. On information and belief, Defendant, ADCOM, is a New Jersey corporation, having its principal place of business at 10 Timber Lane, Marlboro, New Jersey 07746.

JURISDICTION AND VENUE

6. Jurisdiction over Counts I and II is expressly conferred on this Court under 15 U.S.C. §1121, and 28 U.S.C. §§1331 and 1338. Jurisdiction over Counts III and IV is conferred on this Court under 28 U.S.C. §1338, since these claims are joined with substantial and related claims under the Trademark Laws of the United States, 28 U.S.C. §1367 the supplemental jurisdiction of this Court, and under 15 U.S.C. §1332 as the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

7. Personal jurisdiction over KEF AUDIO (UK) LTD. is vested in this Court since KEF AUDIO (UK) LTD. has committed one or more of the acts complained of herein within this State and Judicial District. Personal jurisdiction over KEF AUDIO (UK) LTD. is further vested in this Court pursuant to one or more sections of 735 ILCS §§ 5/2-201 through 5/2-213, and/or Rule 4(k), Fed. R. Civ. P.

8. Personal jurisdiction over ADCOM is vested in this Court since ADCOM has committed one or more of the acts complained of herein within this State and Judicial District.

9. Regarding Defendant KEF AUDIO (UK) LTD., venue is proper under 28 U.S.C. §1391. KEF AUDIO (UK) LTD. is an alien corporation, and at all times material to this Complaint, KEF AUDIO (UK) LTD. has committed one or more of the acts complained of herein within this State and District.

10. Regarding Defendant ADCOM, venue is proper under 28 U.S.C. §1391. At all times material to this Complaint, ADCOM has committed one or more of the acts complained of herein within this State and District.

RELEVANT FACTS

11. Plaintiff, B & W LOUDSPEAKERS LIMITED ("B&W"), manufactures, markets, and sells audio loudspeakers.

12. Plaintiff, EQUITY INTERNATIONAL, INC. ("Equity"), is the exclusive distributor of B&W's loudspeakers in the United States. Equity is a wholly owned subsidiary of B&W.

13. Since at least the early 1980's, Plaintiffs have sold distinctively configured loudspeakers featuring having convexly arcuate side panels that are tapered toward the rear of the cabinet, a convexly arcuate an upper surface, and a tweeter mounted to the front of the convexly arcuate upper surface ("the trade dress"). Plaintiffs are the owners of the trade dress. Plaintiffs' Nautilus™ 800 Series loudspeakers, currently exhibit the trade dress. (See **EXHIBIT A**). Plaintiffs' loudspeaker trade dress is unique, arbitrary, and not functional. In addition, Plaintiffs have promoted their distinctively configured loudspeaker trade dress. At minimum, Plaintiffs' long use and promotion of their loudspeaker trade dress has caused the trade dress to acquire secondary meaning.

14. Defendant KEF AUDIO (UK) LTD. ("KEF") manufactures, markets and sells audio loudspeakers.

15. On information and belief, Defendant ADCOM distributes KEF's loudspeakers in the United States.

16. Defendants have undertaken, without the prior knowledge or authorization of Plaintiffs, the manufacture, importation, advertisement, offer for sale and/or sale, in commerce, of loudspeakers exhibiting the B&W trade dress. These loudspeakers are marketed and offered for sale under the name "Reference Series" ("the Reference Series"), including Models 201, 202c, 203, 204c, 205, and 207. (See **EXHIBIT B**).

17. The Reference Series loudspeakers are virtually identical to the Plaintiffs' proprietary loudspeaker trade dress as embodied in Plaintiffs' Nautilus™ 800 Series loudspeakers.

18. On information and belief, Defendants were aware of Plaintiffs' proprietary loudspeaker trade dress prior to the marketing and sale of Defendants' Reference Series speakers, and Defendants' actions were taken willfully.

COUNT I

TRADE DRESS INFRINGEMENT

19. As a first and complete ground for relief, Plaintiffs hereby charge Defendants with federal unfair competition under the trademark laws of the United States and, in particular, 15 U.S.C. §1125(a), for unlawful appropriation of proprietary appearance features of Plaintiffs' loudspeaker trade dress, and reallege paragraphs 1-18 above.

20. The external appearance features of Plaintiffs' loudspeakers are unique, arbitrary, and possess secondary meaning and contribute to the overall distinctive trade dress of Plaintiffs' loudspeakers, and are, therefore, proprietary with Plaintiffs.

21. Defendants have adopted and are using in commerce in connection with the manufacture, importation, advertising and sale of loudspeakers, loudspeakers having the overall distinctive trade dress owned by Plaintiffs.

22. Through extensive use and promotion, such loudspeaker appearance features have come to be recognized as denoting Plaintiffs as the source and are proprietary with Plaintiffs.

23. Defendants' adoption and use in commerce of certain of Plaintiffs' proprietary loudspeaker features without authorization of Plaintiffs constitutes an unlawful appropriation, copying and simulation of Plaintiffs' trade dress and product appearance and will likely cause confusion, mistake, or deception as to the affiliation, connection or association of Defendants with Plaintiffs, or as to the origin, sponsorship or approval of their goods by Plaintiffs, in violation of 15 U.S.C. §1125(a). Such conduct has and will continue to injure Plaintiffs by direct diversion of sales to Defendants, and by diminishing and destroying Plaintiffs' good will in their trade dress.

COUNT II

TRADE DRESS DILUTION

24. As a second and complete ground for relief, Plaintiffs hereby charge Defendants with trademark dilution under the laws of the United States, 15 U.S.C. §1125(c), and reallege Paragraphs 1-23 of this Complaint.

25. Through promotion and use of their loudspeaker trade dress over several years, Plaintiffs' distinctive trade dress has become famous.

26. Defendants' manufacture, importation, advertisement, offer for sale and/or sale, in commerce, of the Reference Series loudspeakers exhibiting Plaintiffs' trade dress dilutes the distinctive quality of Plaintiffs' trade dress.

27. Defendants' use of the Plaintiffs' trade dress in connection with the Reference Series loudspeakers began after Plaintiffs' loudspeaker trade dress became famous.

28. Unless Defendants' conduct is enjoined, it will dilute the distinctive quality of Plaintiffs' loudspeaker trade dress and will inevitably destroy the promotional value of such trade dress and the good will associated with such trade dress, which Plaintiffs have developed.

COUNT III

DECEPTIVE TRADE PRACTICES

29. As a third and complete ground for relief, Plaintiffs hereby charge Defendants with deceptive trade practices, in violation of the Illinois Deceptive Trade Practices Act, 815 ILCS 510/1 - 510/7, and reallege Paragraphs 1-28 of this Complaint.

30. Defendants have made use of Plaintiffs' proprietary loudspeaker trade dress in offering for sale and/or selling Defendants' loudspeakers, thereby causing a likelihood of confusion or of misunderstanding as to affiliation, connection or association with or certification by Plaintiffs, have passed off their products as those of Plaintiffs, and/or have engaged in other conduct which similarly creates a likelihood of confusion or misunderstanding.

COUNT IV

CONSUMER FRAUD

31. As a fourth and complete ground for relief, Plaintiffs hereby charge Defendants with consumer fraud and deceptive business practices, in violation of the Illinois Consumer Fraud

and Deceptive Trade Practices Act enacted by the State of Illinois, 815 ILCS 505/1-505/12, and reallege Paragraphs 1-30 of this Complaint.

32. The aforesaid unfair competition and deceptive acts and practices of Defendants with respect to its advertisement and sale of loudspeakers constitute consumer fraud and deceptive trade practices, in violation of the Illinois Consumer Fraud and Deceptive Trade Practices Act enacted by the State of Illinois, 815 ILCS 505/1-505/12, and are subject to the sanctions provided therein.

PRAYER FOR RELIEF

Plaintiffs, B & W LOUDSPEAKERS LIMITED and EQUITY INTERNATIONAL, INC., pray for the following relief:

1. Judgment confirming that the loudspeaker trade dress is owned by B&W and EQUITY, and that B&W and EQUITY have the exclusive right to use the trade dress in commerce.
2. Judgment that KEF AUDIO (UK) LTD. and ADCOM have competed unfairly with B&W and EQUITY, have unlawfully and without authorization used B&W's and EQUITY's trade dress by use of product configurations or appearances confusingly similar to those adopted and owned by B&W and EQUITY, and have diluted the distinctive qualities of Plaintiffs' trade dress.
3. That KEF AUDIO (UK) LTD. and ADCOM and their officers, agents, servants, employees, attorneys, and all other persons in active concert and/or participation with them who receive notice, be preliminary and permanently enjoined and restrained from:
 - a. Using any trade dress identical or confusingly similar to B&W's and EQUITY's trade dress, or any colorable imitations thereof;
 - b. Otherwise infringing B&W's and EQUITY's trade dress;

- c. Otherwise unfairly competing with B&W and EQUITY;
- d. Otherwise diluting B&W and EQUITY's trade dress; and
- e. Causing a likelihood of confusion or misunderstanding as to source, association with, affiliation with, sponsorship of, approval of, or certification of, or by B&W and/or EQUITY, or engaging in any other conduct which tends to pass off KEF AUDIO (UK) LTD.'s and/or ADCOM's products as those of B&W and/or EQUITY or tends to create a likelihood of confusion, misunderstanding, or false representation.

4. That KEF AUDIO (UK) LTD. and ADCOM be directed to file in Court, and to serve on B&W and EQUITY, within thirty (30) days after entry of the above injunction, a report in writing, under oath, setting forth in detail the manner and form in which it has complied with the injunction.

5. That KEF AUDIO (UK) LTD. and ADCOM be directed to deliver up to this Court for destruction, pursuant to 15 U.S.C. §1118, all prints, advertisements, tapes or other articles in its possession bearing or exhibiting B&W's and EQUITY'S trade dress, or any reproduction, counterfeit, copy or colorable imitation thereof, and all plates, molds, matrices, screens, or other means of making the same.

6. That KEF AUDIO (UK) LTD. and ADCOM be directed to deliver up to B&W and EQUITY, or otherwise destroy, all tooling used in the manufacturing and production of any products exhibiting, diluting, or likely to cause confusion with B&W's and EQUITY's trade dress and any other loudspeakers made with such tooling.

7. That an accounting be held and judgment rendered for damages sustained by B&W and EQUITY on account of KEF AUDIO (UK) LTD.'s and ADCOM's unfair competition and that, in view of the flagrant and deliberate character of such unfair competition, such damages be trebled and punitive damages be assessed.

8. That this Court make an award of attorneys' fees and taxable costs, and such other and further relief to B&W and EQUITY as the Court deems just.

JURY DEMAND

Plaintiffs, B & W LOUDSPEAKERS LIMITED and EQUITY INTERNATIONAL, INC.,
request a trial by jury.

Respectfully submitted,
B & W LOUDSPEAKERS LIMITED and
EQUITY INTERNATIONAL, INC.

Dated: 11/6/01

By Linda A. Kuczma
Linda A. Kuczma
Daniel N. Christus
Peter M. Klobuchar
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311 South Wacker Drive, 53rd Floor
Chicago, Illinois 60606-6622
(312) 554-3300

(133941.1)

Counsel for Plaintiffs

Nautilus™800

Floor-standing loudspeaker system

Product Summary

- Technically similar to the Signature™800, it is presented in the standard Nautilus™800 Series veneers. The imposing Nautilus™800 stands firmly on a cast aluminium plinth, which contains the crossover components – each one painstakingly selected to preserve the finest nuances in the signal.
- The gracefully curved cabinet, veneered in a choice of finishes and the sloping top surface covered in the finest Connolly Leather, houses two 10-inch bass drivers. Together with the down-firing Flowport, these deliver bass of prodigious dynamics. An improved version of the FST™ midrange driver, exhibits such low levels of distortion and coloration that it does not draw attention to itself.
- Contributing to the incredibly open sound, the tube loaded tweeter extends the system response well into the ultrasonic region.

Technical highlights



Tweeter on top: B&W's Tweeter on top technology ensures that the sound remains focused and time-sensitive and that the stereo-image is presented with unparalleled three dimensional accuracy.



Kevlar®: B&W developed and patented the method of using Kevlar® for loudspeaker cones to reduce unwanted standing waves. DuPont originally created Kevlar® for use in bulletproof vests.

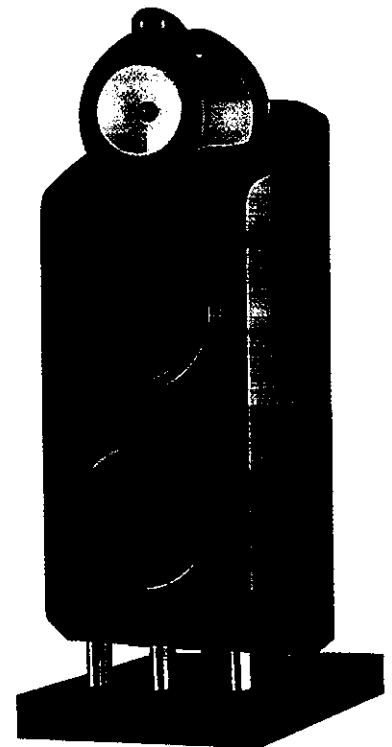


Flowport™: Golf ball aerodynamics theory points the way towards lower distortion reflex ports. Dimples improve the way the air flows over the surface of any object. In the case of reflex ports, they offer a significant improvement over simply flaring the port ends in reducing air flow turbulence at each end of the port; so you get less chuffing noise and less compression at high sound levels.



Matrix™: The basic construction of nearly all loudspeakers is exactly the same – panels of wood-based materials, bonded to form a rectangular box. B&W studied and evaluated how each aspect of cabinet behaviour and the efficiency of various materials and construction methods affects sound.

Description	3-way vented box system	Nominal impedance	8Ω (minimum 3.0Ω)
Drive units	1 x 25mm metal dome high-frequency 1 x 160mm woven Kevlar® cone FST™ midrange 2 x 250mm Paper/Kevlar® cone bass	Power handling	50W - 1000W into 8Ω on unclipped programme
Frequency response	37Hz - 23kHz ± 2db on reference axis	Dimensions	Height: 1197mm Width: 450mm Depth: 645mm
Sensitivity	91db spl (2.83V, 1m)	Finishes	Cabinet: Grey Tigers Eye real wood veneer, Grille: Black Connolly leather



B&W

LISTEN AND YOU'LL SEE

Nautilus™ 801

Floor-standing loudspeaker system

Product Summary

- Visually stunning, the new Nautilus 801's form is governed by its function: the faithful reproduction of music, as intended by the artist, with the clarity, accuracy and dynamic scale required by discerning audiophiles and recording engineers.
- Since its launch the Nautilus 801 has gained rave reviews from composers, musicians, recording professionals and Hi-Fi press alike. Groundbreaking Nautilus™ technology is incorporated into the three-way passive system of bass unit, midrange driver and tweeter.
- By situating each driver in purpose designed enclosures, B&W eliminates back resonance thus delivering unrivalled clarity, accuracy and dynamic scale. The head enclosures are Marlan®, a moulded synthetic, mineral filled resin. It's granite hard, yet still sufficiently manageable to handle the crucially fine tolerances required in manufacture. The result is an audio experience that is thrilling, absorbing and utterly satisfying.

Awarded Component of the Year
1998, Stereo Sound Japan

The Jazz Component Award
1998 Swing Journal Japan

Product of the Year
Hi-Fi Grand Prix Award 1998
Audio Video International USA

Product of the Year
Hi-Fi Show & Home Theatre '99
1999 Russia

1999 Golden Note
Award Winner
Best Loudspeaker Design
Over \$8000
The Academy USA

1999 Product of the Year
Stereophile USA

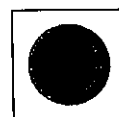
Technical highlights



Tweeter on top: B&W's Tweeter on top technology ensures that the sound remains focused and time-sensitive and that the stereo-image is presented with unparalleled three dimensional accuracy.



Kevlar®: B&W developed and patented the method of using Kevlar® for loudspeaker cones to reduce unwanted standing waves. DuPont originally created Kevlar® for use in bulletproof vests.

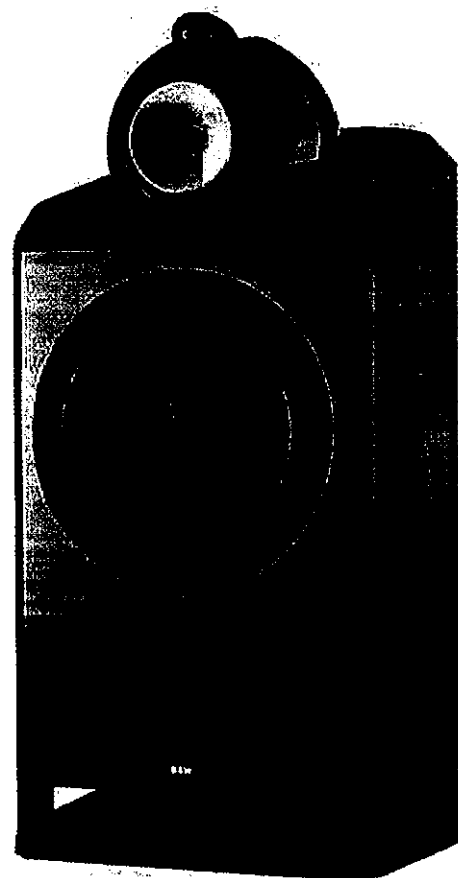


Flowport™: Golf ball aerodynamics theory points the way towards lower distortion reflex ports. Dimples improve the way the air flows over the surface of any object. In the case of reflex ports, they offer a significant improvement over simply flaring the port ends in reducing air flow turbulence at each end of the port; so you get less chuffing noise and less compression at high sound levels.



Matrix™: The basic construction of nearly all loudspeakers is exactly the same - panels of wood-based materials, bonded to form a rectangular box. B&W studied and evaluated how each aspect of cabinet behaviour and the efficiency of various materials and construction methods affects sound.

Description	3-way vented box system	Nominal impedance	8Ω (min 3.0Ω)
Drive units	1 x 25mm metal dome high-frequency 1 x 150mm woven Kevlar® cone FST midrange 1 x 380mm paper/Kevlar® cone bass	Power handling	50W - 1000W into 8 ohm on unclipped programme
Frequency response	37Hz - 20kHz ± 2dB on reference axis	Dimensions	Height: 1111mm Width: 522mm Depth: 690mm
Sensitivity	91dB spl (2.83V, 1m)	Finishes	Cabinet: Real wood veneers, Black Ash, Cherrywood, Red Stained Cherrywood Grilles: Black cloth



B&W

LISTEN AND YOU'LL SEE

Nautilus™ 802

Floor-standing loudspeaker system

Product Summary

- The Nautilus 802 incorporates two bass drivers which allowed the engineers to design a narrower cabinet whilst maintaining the excellent performance of the Nautilus 801.
- The 802 has received excellent reviews from the Hi-Fi press for both aesthetics and sound quality. The cabinet incorporates the unique Matrix bracing system, which reduces resonances and movement within the cabinet. The Flowport™ directly fires down onto the plinth for maximum dispersion and heart stopping bass response.

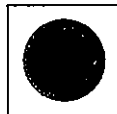
Technical highlights



Tweeter on top: B&W's Tweeter on top technology ensures that the sound remains focused and time-sensitive and that the stereo-image is presented with unparalleled three dimensional accuracy.



Kevlar®: B&W developed and patented the method of using Kevlar® for loudspeaker cones to reduce unwanted standing waves. DuPont originally created Kevlar® for use in bulletproof vests.



Flowport™: Golf ball aerodynamics theory points the way towards lower distortion reflex ports. Dimples improve the way the air flows over the surface of any object. In the case of reflex ports, they offer a significant improvement over simply flaring the port ends in reducing air flow turbulence at each end of the port; so you get less chuffing noise and less compression at high sound levels.



Matrix™: The basic construction of nearly all loudspeakers is exactly the same - panels of wood-based materials, bonded to form a rectangular box. B&W studied and evaluated how each aspect of cabinet behaviour and the efficiency of various materials and construction methods affects sound.

Product of the Year
Hi-Fi Grand Prix Award
1999 USA

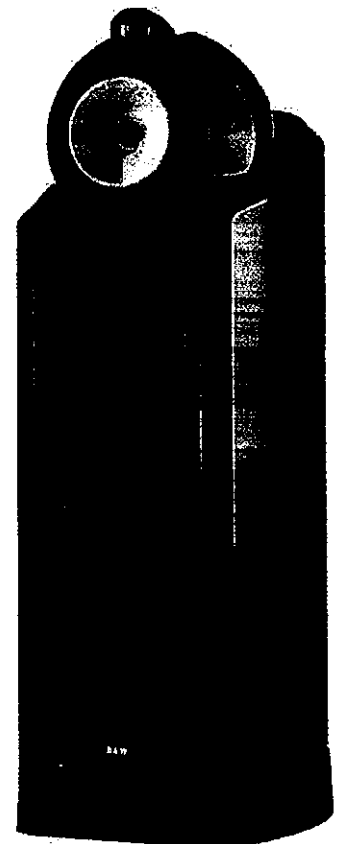
1999 Golden Note
Award Winner
Best Loudspeaker Design
\$8000 and under
The Academy USA

1999 Product of the Year
Media Totaal Award '99
Multi Media Totaal Netherlands



European High End Audio of the
Year 1999-2000
EISA Awards

Description	3-way vented-box system	Nominal impedance	8Ω (min 3.0Ω)
Drive units	1 x 25mm metal dome high-frequency 1 x 150mm woven Kevlar® cone FST midrange 2 x 200mm paper/Kevlar® cone bass	Power handling	50W - 500W into 8 ohm on unclipped programme
Frequency response	39Hz - 20kHz ± 2dB on reference axis	Dimensions	Height: 1106mm Width: 385mm Depth: 548mm
Sensitivity	91dB SPL (2.83V, 1m)	Finishes	Cabinet: Real wood veneers, Black Ash, Cherrywood, Red Stained Cherrywood Grilles: Black cloth



LISTEN AND YOU'LL SEE

Nautilus™ 803

Floor-standing loudspeaker system

Product Summary

- Floor-standing design with a two in one cabinet construction, which reduces sound diffraction between the bass and midrange. Nautilus™ treble unit, Matrix™ cabinet and Flowport™ bass tube.
- The Nautilus 803 cabinet is made up of layers of ply. The graceful curves of the cabinet are skillfully moulded layer by layer which helps to eliminate the unwanted resonances caused by flexing of flat and square cabinet walls.

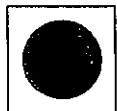
Technical highlights



Tweeter on top: B&W's Tweeter on top technology ensures that the sound remains focused and time-sensitive and that the stereo-image is presented with unparalleled three dimensional accuracy.



Kevlar®: B&W developed and patented the method of using Kevlar® for loudspeaker cones to reduce unwanted standing waves. DuPont originally created Kevlar® for use in bulletproof vests.

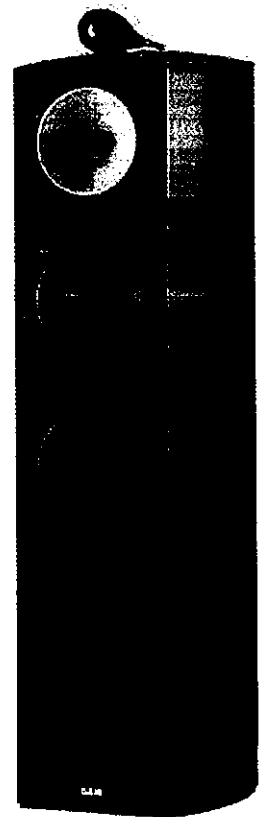


Flowport™: Golf ball aerodynamics theory points the way towards lower distortion reflex ports. Dimples improve the way the air flows over the surface of any object. In the case of reflex ports, they offer a significant improvement over simply flaring the port ends in reducing air flow turbulence at each end of the port; so you get less chuffing noise and less compression at high sound levels.



Matrix™: The basic construction of nearly all loudspeakers is exactly the same - panels of wood-based materials, bonded to form a rectangular box. B&W studied and evaluated how each aspect of cabinet behaviour and the efficiency of various materials and construction methods affects sound.

Description	3 way vented box system	Nominal impedance	8Ω (min 3.0Ω)
Drive units	1 x 25mm metal dome high frequency 1 x 150mm woven Kevlar® cone FST midrange 2 x 180mm paper/Kevlar® cone bass	Power handling	50W - 250W into 8 ohm on unclipped programme
Frequency response	42Hz - 20kHz ± 2dB on reference axis	Dimensions	Height: 1064mm Width: 285mm Depth: 431mm
Sensitivity	90dB spl (2.83V, 1m)	Finishes	Cabinet: Real wood veneers, Black Ash, Cherrywood, Red Stained Cherrywood Grilles: Black cloth



LISTEN AND YOU'LL SEE

Nautilus™ 804

Floor-standing loudspeaker system

Product Summary

- The Nautilus 804 incorporates the design rigor of the larger speakers within the range at a more affordable price, whilst maintaining the acclaimed acoustics and looks.
- The Nautilus 804 is probably the most living room-friendly loudspeaker in the range with its tall and slim design, which incorporates the Nautilus™ cabinet with the excellent quality veneer.
- The technical features includes freestanding tweeter, surround-less Kevlar® midrange and tapered tubes for absorbing rearward output of mid and high frequencies. Reviews have included comments such as "Extremely proficient, revealing and pleasing to both the eyes and ears".



Tweeter on top: B&W's Tweeter on top technology ensures that the sound remains focused and time-sensitive and that the stereo-image is presented with unparalleled three dimensional accuracy.



Kevlar®: B&W developed and patented the method of using Kevlar® for loudspeaker cones to reduce unwanted standing waves. DuPont originally created Kevlar® for use in bulletproof vests.

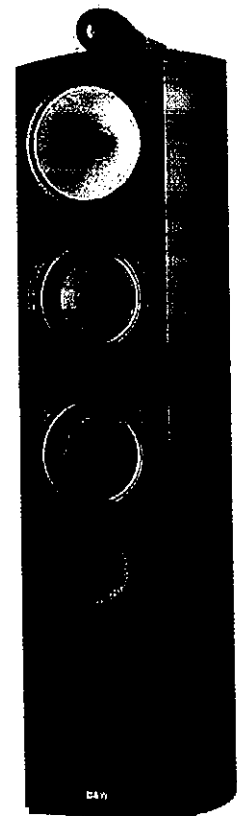


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Matrix™: The basic construction of nearly all loudspeakers is exactly the same - panels of wood-based materials, bonded to form a rectangular box. B&W studied and evaluated how each aspect of cabinet behaviour and the efficiency of various materials and construction methods affects sound.

Description	3-way vented-box system	Nominal impedance	8Ω (min 3.0Ω)
Drive units	1 x 25mm metal dome high-frequency 1 x 150mm woven Kevlar® cone FST midrange 2 x 165mm paper/Kevlar® cone bass	Power handling	50W - 200W into 8 ohm on unclipped programme
Frequency response	45Hz - 20kHz ± 2dB on reference axis	Dimensions	Height: 1015mm Width: 238mm Depth: 344mm
Sensitivity	89dB spl (2.83V, 1m)	Finishes	Cabinet: Real wood veneers, Black Ash, Cherrywood, Red Stained Cherrywood Grilles: Black cloth



LISTEN AND YOU'LL SEE

Nautilus™805

Stand-mount/Bookshelf loudspeaker system

Product Summary

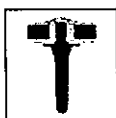
- The Nautilus 805 combines sensuous design with Nautilus™ technology in an affordable bookshelf/stand-mounted speaker.
- Visually striking and sonically refined, the Nautilus 805 is our compact entry level Nautilus 800 Series speaker. This is a two-way design, with a 6.5 inch woven Kevlar® bass/midrange unit complementing the free mounted aluminium dome tweeter. The speaker is magnetically shielded to offer an exceptional audio and visual experience in home cinema installations. Specially designed optional stands are also available.

Best High End Loudspeakers
On Off Audiovisual Product Awards
On Off, 1999 Spain

Diapason D'Or Hi-Fi
Palmerès 1999
Diapason France

Joint Budget Components
1999 Products of the Year
Stereophile USA

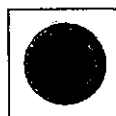
Technical highlights



Tweeter on top: B&W's Tweeter on top technology ensures that the sound remains focused and time-sensitive and that the stereo-image is presented with unparalleled three dimensional accuracy.



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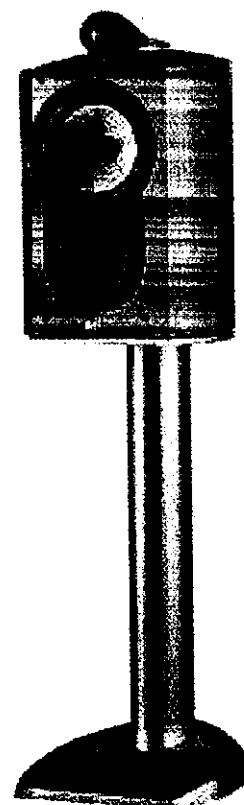


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Matrix™: The basic construction of nearly all loudspeakers is exactly the same - panels of wood-based materials, bonded to form a rectangular box. B&W studied and evaluated how each aspect of cabinet behaviour and the efficiency of various materials and construction methods affects sound.

Description	2-way vented-box system	Power handling	50W - 120W into 8 ohm on unclipped programme
Drive units	1 x 25mm metal dome high-frequency 1 x 165mm woven Kevlar® cone bass/midrange	Dimensions	Height: 415mm Width: 238mm Depth: 344mm
Frequency response	56Hz - 20kHz ± 2dB on reference axis	Finishes	Cabinet: Real wood veneers, Black Ash, Cherrywood, Red Stained Cherrywood Grilles: Black cloth
Sensitivity	88dB spl (2.83V, 1m)		
Nominal impedance	8Ω (min 4.6Ω)		



LISTEN AND YOU'LL SEE

Nautilus™ HTM1

Magnetically shielded centre channel loudspeaker system

Product Summary

- The HTM1 is the larger of the two centre channels in the N800 Series, and incorporates the Nautilus™ tweeter unit, Kevlar® cone and Matrix™ cabinet.
- The speaker consists of one Nautilus™ treble unit, one Kevlar® midrange drive unit and two paper/Kevlar® drivers for bass and midrange. The speaker permits bi-wiring to improve sound quality and imaging, shielding enables the speaker to be placed on or near a television.

Technical highlights



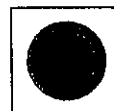
Tweeter on top: B&W's Tweeter on top technology ensures that the sound remains focused and time-sensitive and that the stereo-image is presented with unparalleled three dimensional accuracy.



Kevlar®: B&W developed and patented the method of using Kevlar® for loudspeaker cones to reduce unwanted standing waves. DuPont originally created Kevlar® for use in bulletproof vests.

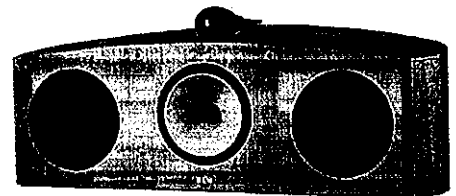


Matrix™: The basic construction of nearly all loudspeakers is exactly the same - panels of wood-based materials, bonded to form a rectangular box. B&W studied and evaluated how each aspect of cabinet behaviour and the efficiency of various materials and construction methods affects sound.



Flowport™: Golf ball aerodynamics theory points the way towards lower distortion reflex ports. Dimples improve the way the air flows over the surface of any object. In the case of reflex ports, they offer a significant improvement over simply flaring the port ends in reducing air flow turbulence at each end of the port; so you get less chuffing noise and less compression at high sound levels.

Product of the Year 1999
HI-FI Grand Prix Award
Audio Video Magazine - USA



Description	3-way closed box system	Nominal impedance	8Ω (min 3.0Ω)
Drive units	1 x 25mm metal dome high frequency 1 x 150mm woven Kevlar® cone FST midrange 2 x 165mm paper/Kevlar® cone bass	Power handling	50W - 250W into 8 ohm on unclipped programme
Frequency response	49Hz - 20kHz ± 2dB on reference axis	Dimensions	Height: 318mm Width: 783mm Depth: 316mm
Sensitivity	90dB spl (2.83V, 1m)	Finishes	Cabinet: Real wood veneers, Black Ash, Cherrywood, Red Stained Cherrywood Grilles: Black cloth

B&W

LISTEN AND YOU'LL SEE

Nautilus™ HTM2

Magnetically shielded centre channel loudspeaker system

Product Summary

- The HTM2 incorporates the Nautilus™ tweeter, Kevlar® bass/midrange and the unique forward facing Flowport™ to improve bass response.
- The HTM2 incorporates Matrix™ bracing and a contoured rear section to minimise sound diffraction. The speaker can be mounted on a television or the specially designed optional stand.

Technical highlights



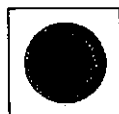
Tweeter on top: B&W's Tweeter on top technology ensures that the sound remains focused and time-sensitive and that the stereo-image is presented with unparalleled three dimensional accuracy.



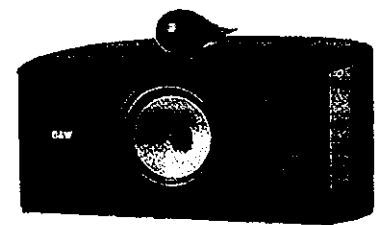
Kevlar®: B&W developed and patented the method of using Kevlar® for loudspeaker cones to reduce unwanted standing waves. DuPont originally created Kevlar® for use in bulletproof vests.



Matrix™: The basic construction of nearly all loudspeakers of the N800 Series is exactly the same - panels of wood-based materials, bonded to form a rectangular box. B&W studied and evaluated how each aspect of cabinet behaviour and the efficiency of various materials and construction methods affects sound.



Flowport™: Golf ball aerodynamics theory points the way towards lower distortion reflex ports. Dimples improve the way the air flows over the surface of any object. In the case of reflex ports, they offer a significant improvement over simply flaring the port ends in reducing air flow turbulence at each end of the port; so you get less chuffing noise and less compression at high sound levels.



Description	2-way vented-box system	Power handling	50W - 120W into 8 ohm on unclipped programme
Drive units	1 x 25mm metal dome high-frequency 1 x 165mm woven Kevlar® cone bass/midrange	Dimensions	Height: 277mm Width: 486mm Depth: 287mm
Frequency response	56Hz - 20kHz ± 2dB on reference axis	Finishes	Cabinet: Real wood veneers, Black Ash, Cherrywood, Red Stained Cherrywood Grilles: Black cloth
Sensitivity	88dB spl (2.83V, 1m)		
Nominal impedance	8Ω (min 4.6Ω)		

Nautilus™SCM1

Wall-mount loudspeaker

Product Summary

- The Nautilus SCM1 is designed for on-wall mounting and features a shallow cabinet construction. The speaker incorporates the Nautilus™ tweeter, Kevlar® cone and forward facing Flowport™.
- The mounting arrangements are flexible, wall brackets are supplied with the speaker or you may prefer to mount the speaker directly onto a shelf which is possible with the supplied rubber feet.

Technical highlights



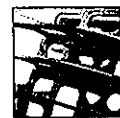
Tweeter on top: B&W's Tweeter on top technology ensures that the sound remains focused and time-sensitive and that the stereo-image is presented with unparalleled three dimensional accuracy.



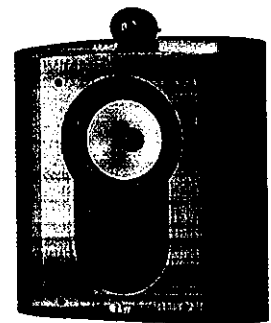
Kevlar®: B&W developed and patented the method of using Kevlar® for loudspeaker cones to reduce unwanted standing waves. DuPont originally created Kevlar® for use in bulletproof vests.



Flowport™: Golf ball aerodynamics theory points the way towards lower distortion reflex ports. Dimples improve the way the air flows over the surface of any object. In the case of reflex ports, they offer a significant improvement over simply flaring the port ends in reducing air flow turbulence at each end of the port; so you get less chuffing noise and less compression at high sound levels.



Matrix™: The basic construction of nearly all loudspeakers is exactly the same - panels of wood-based materials, bonded to form a rectangular box. B&W studied and evaluated how each aspect of cabinet behaviour and the efficiency of various materials and construction methods affects sound.



Description	2-way vented-box system	Power handling	50W · 120W into 8 ohm on unclipped material
Drive units	1 x 25mm metal dome high-frequency 1 x 165mm woven Kevlar® cone bass/midrange	Dimensions	Height: 437mm Width: 372mm Depth: 167mm
Frequency response	80Hz - 20kHz ± 2dB on reference axis	Finishes	Cabinet: Real wood veneers, Black Ash, Cherrywood, Red Stained Cherrywood Grilles: Black cloth
Sensitivity	89dB spl (2.83V, 1m)		
Nominal impedance	8Ω (min 4.7Ω)		



LISTEN AND YOU'LL SEE

KEF UNI-Q® LOUDSPEAKERS

Q SERIES



The latest evolution of the acclaimed Q Series demonstrates how the listening benefits of KEF technology leadership cascade down from the Reference Series to more affordable ranges. With all the inherent advantages of KEF Uni-Q® technology - consistent stereo imaging and wide dispersion characteristics for unrivalled off-axis response - they're as easy to place in the room as they are to drive. Forget sweet spots - with New Q, everyone experiences the same sound quality wherever they sit.

It's no accident that the styling, with Uni-Q 'pod' faired in to the curved section cabinets, echoes the latest Reference Series: every model features a radical new design of Uni-Q driver whose sophisticated 19mm metal dome tweeter and powerful neodymium magnet system is directly developed from the Reference HF unit, and shares the same ultra-low distortion motor system.

The result is outstandingly pure voice reproduction and seamlessly fluid midrange response: clean, sweet and devastatingly accurate. Identical Uni-Q arrays in every model, from the slender full bandwidth floorstanders to the compact bookshelf, centre and rear effects speakers, ensure the perfect tonal match you need to create a faultless 3-D soundscape - especially in the home theatre configurations that suit the new range so well.

KEF's unique B169 'racetrack' LF driver in the Q7 provides generously extended, tightly controlled bass for such a slim cabinet, and the 165mm (6 1/2") bass/mid driver features a copper pole piece cap that reduces distortion by a whopping 10dB. Improved high order crossovers provide even better power handling and smoother transitions - and they're mounted directly to the terminal panel for the cleanest possible signal

transfer. KEF's ingenious internal bracing system is used to tailor the volume of each enclosure to the parameters of its drive unit. All models have two pairs of terminals for bi-wiring or bi-amplification, and are magnetically shielded to prevent interference with other equipment.

Available in a choice of Maple, Dark Apple or Black Ash finishes and built to last, the new Q Series speakers are assertive, musically voiced and deeply satisfying performers - and at the price, nothing else even comes close for delivering the full richness and complexity of modern digital audio formats.



Q3



Q1



Q9c



Q7



Q5



Q8s

EXHIBIT

B

KEF Q SERIES



SPECIFICATIONS

Model	Q1	Q3	Q5
Design	Two way bass reflex	Two way bass reflex	Two and a half way bass reflex
Drive Units	165 mm (6 1/2") Uni-Q® with 19 mm (3/4") aluminium dome HF	165 mm (6 1/2") Uni-Q® with 19 mm (3/4") aluminium dome HF	165 mm (6 1/2") Uni-Q® with 19 mm (3/4") aluminium dome HF
Frequency response at ± 3 dB	45 - 27 kHz	42 - 27 kHz	39 - 27 kHz
Crossover frequency	2.8 kHz	2.8 kHz	2.8 kHz
Amplifier requirements	15 - 120W	15 - 120W	15 - 150W
Sensitivity (2.83V/1m)	91 dB	91 dB	91 dB
Maximum output	111 dB	111 dB	112 dB
Impedance	8 Ω	8 Ω	8 Ω
Magnetic shielding	Yes	Yes	Yes
Weight	6.25 kg (13.8 lbs)	11.5 kg (25.3 lbs)	14.5 kg (32 lbs)
Dimensions (H x W x D)	350 x 220 x 320 mm 13.7 x 8.6 x 12.6 inches	780 x 240 x 320 mm 30.7 x 9.4 x 12.6 inches	880 x 240 x 320 mm 34.6 x 9.4 x 12.6 inches
Finishes	Black Ash, Maple or Dark Apple	Black Ash, Maple or Dark Apple	Black Ash, Maple or Dark Apple

Model	Q7	Q8s	Q9c
Design	Three way bass reflex	Two way closed box	Two way bass reflex
Drive Units	228 x 152 mm (9" x 6") Racetrack woofer 165 mm (6 1/2") Uni-Q® with 19 mm (3/4") aluminium dome HF	165 mm (6 1/2") Uni-Q® with 19 mm (3/4") aluminium dome HF	165 mm (6 1/2") Uni-Q® with 19 mm (3/4") aluminium dome HF
Frequency response at ± 3 dB	35 Hz - 27 kHz	120 Hz - 27 kHz	50 Hz - 27 kHz
Crossover frequency	120 Hz - 2.8 kHz	2.8 kHz	2.8 kHz
Amplifier requirements	15 - 175W	15 - 120W	15 - 120W
Sensitivity (2.83V/1m)	91 dB	90 dB	91 dB
Maximum output	113 dB	108 dB	111 dB
Impedance	8 Ω	8 Ω	8 Ω
Magnetic shielding	Yes	Yes	Yes
Weight	17 kg (37.4 lbs)	3.1 kg (6.82 lbs)	6.2 kg (13.6 lbs)
Dimensions (H x W x D)	950 x 260 x 350 mm 37.4 x 10.2 x 13.7 inches	253 x 170 x 119 mm 10 x 6.7 x 4.7 inches	200 x 480 x 270 mm 7.9 x 18.9 x 10.6 inches
Finishes	Black Ash, Maple or Dark Apple	Video Grey	Black Ash, Maple or Dark Apple

KEF reserve the right, in line with continuing research and development, to amend or change specifications.

KEF AUDIO (UK) Limited
Eccleston Road, Tovil, Maidstone, Kent ME15 6QP.
Telephone: + 44 (0) 1622 672261 Fax: + 44 (0) 1622 750653

enquiries@kef.com

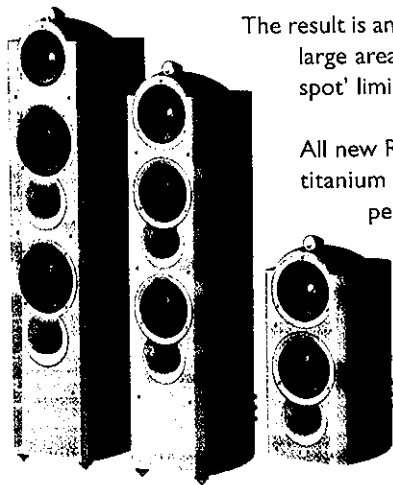


KEF UNI-Q® LOUDSPEAKERS

REFERENCE SERIES

The continuing evolution of KEF's legendary Reference Series has always been based on the concept of benchmark precision. Every time a new generation of models is developed to incorporate more sophisticated technologies, we build prototypes that are as close to perfect as possible. These are the 'Reference' to which every single production version must conform, each pair assembled by a skilled craftsman who matches their performance to a tolerance of just 0.5dB.

Radical new generation Uni-Q® drivers - the ultimate refinement of KEF's trademark technology - provide an immaculate single point source. With midrange cones and surrounds integrated into a single Uni-Form® moulding, there are no discontinuities to distort the HF energy from the 25mm elliptical titanium dome tweeter. With only midrange frequencies to handle, movement of the Uni-Q cone is so modest that virtually no distortion is caused by intermodulation with the tweeter. As in the bass drivers, an open chassis design - fully decoupled - minimises acoustic reflection behind the cone.



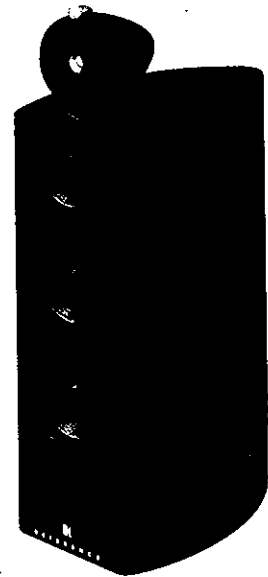
MODEL 205

MODEL 201

MODEL 203

The result is an even more spacious, better defined sound stage over a very large area, with exceptional off-axis response and none of the 'sweet spot' limitations of conventional speakers.

All new Reference Series models come with a state of the art 19mm titanium dome hypertweeter™ for massively extended HF performance. Mounted in low diffraction chrome-plated steel enclosures time aligned with the main array, they deliver flat response to 50 kHz and useful energy up to 70kHz. What you hear is a sweeter, more natural sound.



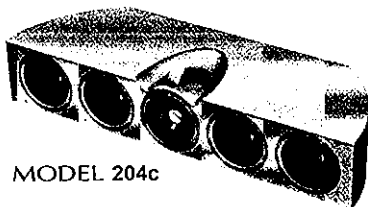
MODEL 207

Bass performance is equally stunning, thanks to ultra-low distortion short coil/long gap motor systems and high tech reinforced diaphragms. With each bass driver radiating directly from its own subdivided internal enclosure to avoid the vertical standing waves that tall cabinets usually suffer from, you experience noticeably clearer, more open bass.

For optimum performance in real rooms, all models accommodate tri-wiring and are fitted with a boundary control device to adjust bass response according to speaker positioning and the acoustics of the listening area. Electromagnetic shielding comes as standard.

As you would expect from a handmade KEF product, build quality is as outstanding as the specification of each individual component. Engineered from dense MDF using KEF's own internal bracing system, the new curved section cabinets are elegantly profiled to minimise colouration and finished in a choice of Black Ash, Maple or Cherry hand-matched hardwood veneers.

More than ever before, these are very special speakers indeed.



MODEL 204c



MODEL 202c



SPECIFICATIONS

Model	MODEL 201	MODEL 203	MODEL 205
Design	4 way reflex	4 way reflex	4 way reflex
Drive Units	LF : 1 x 165 mm (6 1/2") MF : 1 x 165 mm (6 1/2") HF : 1 x 25 mm (1") SHF : 1 x 19 mm (3/4")	LF : 2 x 165 mm (6 1/2") MF : 1 x 165 mm (6 1/2") HF : 1 x 25 mm (1") SHF : 1 x 19 mm (3/4")	LF : 2 x 200 mm (8") MF : 1 x 165 mm (6 1/2") HF : 1 x 25 mm (1") SHF : 1 x 19 mm (3/4")
Frequency response at 15° horizontally off axis ±3 dB LF corner -6 dB	58 Hz - 55 kHz 46 Hz	55 Hz - 55 kHz 40 Hz	45 Hz - 55 kHz 35 Hz
Crossover frequency	400 Hz, 2.7 kHz, 15 kHz	400 Hz, 2.7 kHz, 15 kHz	400 Hz, 2.7 kHz, 15 kHz
Amplifier requirements	50 - 150 W	50 - 200 W	50 - 300 W
Sensitivity (2.83V/1m)	88 dB	89 dB	90 dB
Maximum output	110 dB	113 dB	115 dB
Impedance	8 Ω (3.2 Ω min)	8 Ω (3.2 Ω min)	8 Ω (3.2 Ω min)
Magnetic shielding	Yes	Yes	Yes
Weight	14.8 Kg (32.6 lbs)	26.5 Kg (58.3 lbs)	33 Kg (72.6 lbs)
Dimensions (H x W x D)	557 x 248 x 402 mm 21.9 x 9.8 x 15.5 inches	1068 x 248 x 405 mm 42 x 9.8 x 15.9 inches	1155 x 285 x 433 mm 45.5 x 11.2 x 17 inches
Finishes	Black Ash, Maple or Cherry real wood veneer	Black Ash, Maple or Cherry real wood veneer	Black Ash, Maple or Cherry real wood veneer

Model	MODEL 207	MODEL 202c	MODEL 204c
Design	5 way reflex	4 way reflex	4 way reflex
Drive Units	LF : 2 x 250 mm (10") LMF : 1 x 250 mm (10") MF : 1 x 165 mm (6 1/2") HF : 1 x 25 mm (1") SHF : 1 x 19 mm (3/4")	LF : 2 x 165 mm (6 1/2") MF : 1 x 165 mm (6 1/2") HF : 1 x 25 mm (1") SHF : 1 x 19 mm (3/4")	LF : 4 x 165 mm (6 1/2") MF : 1 x 165 mm (6 1/2") HF : 1 x 25 mm (1") SHF : 1 x 19 mm (3/4")
Frequency response at 15° horizontally off axis ±3 dB LF corner -6 dB	40 Hz - 55 kHz 28 Hz	65 Hz - 55 kHz 50 Hz	53 Hz - 55 kHz 40 Hz
Crossover frequency	120 Hz, 400 Hz, 2.7 kHz, 15 kHz	400 Hz, 2.7 kHz, 15 kHz	400 Hz, 2.7 kHz, 15 kHz
Amplifier requirements	50 - 400 W	50 - 200 W	50 - 300 W
Sensitivity (2.83V/1m)	91 dB	89 dB	90 dB
Maximum output	117 dB	113 dB	115 dB
Impedance	8 Ω (3.2 Ω min)	8 Ω (3.2 Ω min)	8 Ω (3.2 Ω min)
Magnetic shielding	Yes	Yes	Yes
Weight	66 Kg (145 lbs)	16 Kg (35.2 lbs)	35 Kg (77 lbs)
Dimensions (H x W x D)	1290 x 400 x 685 mm 50.7 x 15.7 x 27 inches	240 x 630 x 315 mm 9.4 x 24.8 x 12.4 inches	240 x 1100 x 425 mm 9.4 x 43.3 x 16.7 inches
Finishes	Black Ash, Maple or Cherry real wood veneer	Black Ash, Maple or Cherry real wood veneer	Black Ash, Maple or Cherry real wood veneer

KEF reserve the right, in line with continuing research and development, to amend or change specifications.

KEF AUDIO (UK) Limited
Eccleston Road, Tovil, Maidstone, Kent ME15 6QP.
Telephone: + 44 (0) 1622 672261 Fax: + 44 (0) 1622 750653

enquiries@kef.com



Uni-Q[®]
technology



Hypertweeter™

KEF REFERENCE



JS-44 (Rev. 3/99)

CIVIL COVER SHEET

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

B & W LOUDSPEAKERS LIMITED

Meadow Road, Worthing

West Sussex, England BN11 2RX

SEE ATTACHMENT TO CIVIL COVER SHEET PART I (a) PLAINTIFFS

(b) County of Residence of First Listed Plaintiff

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Linda A. Kuzma

Wallenstein & Wagner, Ltd.

311 South Wacker Drive, 53rd Floor

Chicago, Illinois 60606 (SEE ATTACHMENT I.(c))

(312) 554-3300

DEFENDANTS

KEF AUDIO (UK) LTD

Eccleston Road, Tovil, Maidstone

Kent ME15 6QP, United Kingdom

SEE ATTACHMENT TO CIVIL COVER SHEET PART I.(b) DEFENDANTS

County of Residence of First Listed

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorney's (Firm Name)

MAGISTRATE JUDGE KEYS

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

☐ 1 U.S. Government Plaintiff

Defendant

☒ 3 Federal Question

(U.S. Government Not a Party)

(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

(For Diversity Cases Only)

Citizen of This State

DEF

☐ 1 Incorporated or Principal Place of Business In This State

of Business In Another State

Citizen or Subject of a Foreign Country

☐ 3 Foreign Nation

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS		FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUS
<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 362 Personal Injury — Med. Malpractice	<input type="checkbox"/> 610 Agriculture	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 365 Personal Injury — Product Liability	<input type="checkbox"/> 620 Other Food & Drug	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC	PROPERTY RIGHTS	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 330 Federal Employers' Liability	PERSONAL INJURY	<input type="checkbox"/> 630 Liquor Laws	<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 450 Commerce/ICC R.
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 640 R.R. & Truck	<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 650 Airline Regs.	<input checked="" type="checkbox"/> 840 Trademark	<input type="checkbox"/> 470 Racketeer Influence Corrupt Organization
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans)	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 660 Occupational Safety/Health	SOCIAL SECURITY	<input type="checkbox"/> 810 Selective Service
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 820 Securities/Commodities Exchange
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 360 Other Personal Injury	PRISONER PETITIONS	LABOR	<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 875 Customer Challenge 12 USC 3410
<input type="checkbox"/> 190 Other Contract		<input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus:	<input type="checkbox"/> 710 Fair Labor Standards Act	<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input type="checkbox"/> 891 Agricultural Acts
<input type="checkbox"/> 195 Contract Product Liability		<input type="checkbox"/> 530 General	<input type="checkbox"/> 720 Labor/Mgmt. Relations	<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 892 Economic Stabilization
		<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act	<input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 893 Environmental Mgmt.
		<input type="checkbox"/> 540 Mandamus & Other	<input type="checkbox"/> 740 Railway Labor Act	FEDERAL TAX SUITS	<input type="checkbox"/> 894 Energy Allocation
		<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 790 Other Labor Litigation	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	<input type="checkbox"/> 895 Freedom of Information Act
		<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 900 Appeal or Determination of Federal Tax
REAL PROPERTY	CIVIL RIGHTS				<input type="checkbox"/> 950 Constitutionality of State Statutes
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 441 Voting				<input type="checkbox"/> 890 Other Statutory A
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 442 Employment				
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 443 Housing/Accommodations				
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 444 Welfare				
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 440 Other Civil Rights				
<input type="checkbox"/> 290 All Other Real Property					

V. ORIGIN

(PLACE AN "X" IN ONE BOX ONLY)

☒ 1 Original Proceeding☐ 2 Removed from State Court☐ 3 Remanded from Appellate Court☐ 4 Reinstated or Reopened

Transferred from another district (specify)

☐ 6 Multidistrict Litigation

Appeal to Judge from Magistrate Judgment

VI. CAUSE OF ACTION

(Cite the U.S. Civil Statute under which you are filing and write brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

15 U.S.C. §§ 1125 et seq.

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint

JURY DEMAND:

☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions)

JUDGE

DOCKET NUMBER

DATE

11/6/01

SIGNATURE OF ATTORNEY OF RECORD

Linda A. Kuzma

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

B & W LOUDSPEAKERS LIMITED and
EQUITY INTERNATIONAL, INC.

Plaintiff,

v.

KEF AUDIO (UK) LTD. and
ADCOM

Defendant.

FILED-805
96 NOV -6 PM 4:36
CLERK
01C 8541
Civil Action No.

JURY DEMANDED

JUDGE GETTLEMAN

MAGISTRATE JUDGE KEY

ATTACHMENT TO CIVIL COVER SHEET
ATTACHMENT I.(a)

ATTACHMENT I. Part A

Additional Plaintiff:

EQUITY INTERNATIONAL, INC.
54 Concord Street
North Reading, Massachusetts 01864
County of Residence:

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED-EDS
01 NOV -6 PM 4:36
CLERK
U.S. DISTRICT COURT

B & W LOUDSPEAKERS LIMITED and
EQUITY INTERNATIONAL, INC.

Plaintiff,

v.

KEF AUDIO (UK) LTD. and
ADCOM

Defendant.

01C 8541
Civil Action No. _____

JURY DEMANDED

JUDGE GETTLEMAN

MAGISTRATE JUDGE KEYS

ATTACHMENT TO CIVIL COVER SHEET
ATTACHMENT I.(b)

ATTACHMENT I. Part B

Additional Defendant:

ADCOM
10 Timber Lane
Marlboro, New Jersey 07746
County of Residence:

FILED-EDS
01 NOV -5 PM 11
CLERK
U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

B & W LOUDSPEAKERS LIMITED and
EQUITY INTERNATIONAL, INC.

Plaintiff,

v.

KEF AUDIO (UK) LTD. and
ADCOM

Defendant.

Civil Action No. **010 8541**

JURY DEMANDED JUDGE GETTLEMAN

MAGISTRATE JUDGE KEYS

ATTACHMENT TO CIVIL COVER SHEET
ATTACHMENT I.(c)

ATTACHMENT I. Part C

Additional Attorneys for Plaintiff

Daniel N. Christus
WALLENSTEIN & WAGNER, LTD.
311 South Wacker Drive, 53rd Floor
Chicago, Illinois 60606-6622
(312) 554-3300

Peter M. Klobuchar
WALLENSTEIN & WAGNER, LTD.
311 South Wacker Drive, 53rd Floor
Chicago, Illinois 60606-6622
(312) 554-3300

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

In the Matter of

B & W LOUDSPEAKERS LIMITED and EQUITY INTERNATIONAL, INC.

v.

KEF AUDIO (UK) LTD. and ADCOM

01C 8541
Case Number:

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR: **JUDGE GETTLEMAN**

B & W LOUDSPEAKERS LIMITED and EQUITY INTERNATIONAL, INC.

(A)	(B)
SIGNATURE <i>Linda A. Kuczma</i>	SIGNATURE <i>Daniel N. Christus</i>
NAME Linda A. Kuczma	NAME Daniel N. Christus
FIRM WALLENSTEIN & WAGNER, LTD	FIRM WALLENSTEIN & WAGNER, LTD
STREET ADDRESS 311 South Wacker Drive, 53rd Floor	STREET ADDRESS 311 South Wacker Drive, 53rd Floor
CITY/STATE/ZIP Chicago, Illinois 60606	CITY/STATE/ZIP Chicago, Illinois 60606
TELEPHONE NUMBER 312/554-3300	TELEPHONE NUMBER 312/554-3300
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 6,180,964	IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 6,189,792
MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	MEMBER OF TRIAL BAR? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
(C)	(D)
SIGNATURE <i>Peter M. Klobuchar</i>	SIGNATURE
NAME Peter M. Klobuchar	NAME
FIRM WALLENSTEIN & WAGNER, LTD	FIRM
STREET ADDRESS 311 South Wacker Drive, 53rd Floor	STREET ADDRESS
CITY/STATE/ZIP Chicago, Illinois 60606	CITY/STATE/ZIP
TELEPHONE NUMBER 312/554-3300	TELEPHONE NUMBER
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 6,237,458	IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)
MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>
TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>
DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>

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